

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NETLIST, INC.,

Plaintiff,

vs.

MICRON TECHNOLOGY, INC.,
MICRON SEMICONDUCTOR
PRODUCTS, INC., and MICRON
TECHNOLOGY TEXAS LLC,

Defendants.

Civil Action No. 2:22-cv-203-JRG

JURY TRIAL DEMANDED

**DECLARATION OF JASON G. SHEASBY IN SUPPORT OF PLAINTIFF
NETLIST INC.'S OPPOSED MOTION FOR LEAVE TO SUPPLEMENT P.R.
3-1 AND 3-2 DISCLOSURES**

I, Jason G. Sheasby, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. (“Netlist”) in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Netlist’s Opposed Motion for Leave to Supplement P.R. 3-1 and 3-2 Disclosures. I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 1** is a true and correct copy of Plaintiff Netlist's 1st Supplemental Disclosure of Asserted Claims and Infringement Contentions, dated January 27, 2023.

3. Attached as **Exhibit 2** is true and correct redlined draft of Plaintiff Netlist's 1st Supplemental Disclosure of Asserted Claims and Infringement Contentions, dated January 27, 2023.

4. Attached as **Exhibit 3** is true and correct copy of Plaintiff Netlist's Disclosure of Asserted Claims and Infringement Contentions, dated September 8, 2022.

5. Attached as **Exhibit 4** is a true and correct copy of the transcript of the Motion Hearing held before U.S. District Judge Rodney Gilstrap in the case of *Netlist, Inc. v. Samsung Elecs. Co. Ltd.*, No. 2:21-cv-00463-JRG, (E.D. Tex. Jan. 19, 2023).

6. Attached as **Exhibit 5** is a true and correct copy of a letter from Netlist counsel to Micron counsel regarding document production, dated January 21, 2023.

7. Attached as **Exhibit 6** is a true and correct copy of an email chain between Netlist counsel and Micron counsel regarding supplemental infringement contentions, between January 27, 2023 and March 31, 2023.

8. Attached as **Exhibit 7** is a true and correct copy of the Declaration of Jayson Sohi in support of Netlist, Inc.'s Motion for Leave to Amend its Preliminary Infringement Contentions

(Dkt. 130) in the case of *Netlist, Inc. v. Samsung Elecs. Co. Ltd.*, No. 2:21-cv-00463-JRG, (E.D. Tex. dated January 16, 2023).

9. Attached as **Exhibit 8** is an email from Netlist counsel to Micron counsel regarding an error in Netlist's document production, dated January 21, 2023.

Executed on March 31, 2023, in Los Angeles, California.

By /s/ Jason G. Sheasby
Jason G. Sheasby